

**FOR THE SOUTHERN DISTRICT OF OHIO,
EASTERN DIVISION**

IN THE MATTER OF THE SEARCH OF:)	Case No: 2:22-mj-584
)	
Cordell A. WASHINGTON, DOB: 10/17/1986,)	
Currently incarcerated at Franklin County Correction)	Magistrate Judge: Deavers
Center II, 2460 Jackson Pike, Columbus, Ohio 43223.)	

AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT

I, Peter N. Vanderbilt, Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), being duly sworn, hereby depose and state as follows:

EDUCATION, TRAINING, AND EXPERIENCE

1. I am a Police Officer and Detective with the Columbus Division of Police, assigned full-time as a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), Columbus District Office. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in Title 18 U.S.C. § 2516. Your affiant has been employed by the Columbus Division of Police as a “Law Enforcement Officer,” as defined in the Ohio Revised Code Section 2901.01, since August 1993. Your affiant is empowered to investigate, to make arrests with or without warrants and to execute search warrants under the authority of Title 21 U.S.C. § 878 and the Ohio Revised Code.

2. Prior to being assigned to the DEA Task Force, your affiant was assigned to the Columbus Division of Police, Patrol Unit from August 1993 to September 2010 then to the Training Bureau between September 2010 and July 2019.

3. I graduated from the Columbus Division of Police Academy located in Columbus, Ohio in August of 1993. I received approximately 6 months of specialized police

training including, but not limited to: search and seizure, investigative techniques, testifying in court, evidence collection, interview and interrogation, and controlled substance identification.

4. During the course of my law enforcement career, I have had experience in debriefing defendants and interviewing participating witnesses, cooperating individuals and other persons who have personal knowledge and experience regarding narcotics related investigations.

5. As a DEA TFO and police officer, I have participated in the execution of search warrants at the residences and businesses of narcotics traffickers, safe houses, crack houses, and have participated in numerous arrests for drug related offenses. I have drafted numerous search warrants.

6. As a Task Force Officer, I have participated in investigations targeting individuals and organizations trafficking heroin, cocaine, cocaine base ("crack"), marijuana, fentanyl and its analogues, methamphetamine and other controlled substances as defined in 21 U.S.C. § 801 and ORC 2925. I know that these are controlled substances under 21 U.S.C. § 801 and ORC 2925.

PURPOSE OF THE AFFIDAVIT

7. I make this affidavit in support of an application for a warrant to search and obtain Deoxyribonucleic Acid (DNA) sample from the person of Cordell A. WASHINGTON, DOB: 10/17/1986, who is currently an inmate, #0140219, in the custody of the Franklin County Sheriff's Department, specifically Franklin County Correction Center II, 2640 Jackson Pike, Columbus, Ohio 43223. As set forth in this affidavit, this DNA sample may constitute evidence of a violation of 18 U.S.C. §924(c) (possession of a firearm in furtherance of drug trafficking crime).

8. This affidavit is intended to show that there is sufficient probable cause for the above-described warrant and does not purport to set forth all my knowledge of, or investigation into, this matter. For that reason, I have not included each and every fact known to me concerning this investigation. I have not omitted facts that would negate probable cause. The facts and information set forth in this affidavit are based upon my knowledge, training, experience, and participation in this investigation, my interviews of various witnesses, including law enforcement personnel who participated in the investigation, and my review of certain records and documents.

9. Based on my education, training, and experience, I know that skin, saliva, blood, and/or hair evidence left behind at a crime scene may contain a unique DNA profile that can sometimes be identified by forensic scientists when those scientists compare the evidence to a known standard. I know that when individuals wear clothing or handle an item, such as a firearm, they may leave behind secretions and/or skin cells that contain their unique DNA profile. I also know from my training, education, and experience that oral swabs taken from an individual (buccal swab) will contain a known standard of that person's DNA profile. This standard can then be compared to an unknown standard by a forensic scientist in an effort to identify the unknown DNA sample.

10. Deoxyribonucleic acid (DNA) is genetic coding material which is unique to each individual. Laboratory analysis of DNA material can establish whether material, such as saliva, skin, hair, or blood came from a particular individual. Because DNA is sometimes left behind on physical items previously touched by a particular individual, DNA evidence can be useful, admissible evidence in demonstrating that a particular person was at one time in possession of a piece of evidence, present at a given location, or inside a particular vehicle.

11. The items to be seized are swabs (commonly referred to as buccal swabs) of DNA material of Cordell A. **WASHINGTON** from the inside of the mouth and cheek. The evidence to be seized is on the person of Cordell A. **WASHINGTON**.

INVESTIGATION AND PROBABLE CAUSE

BACKGROUND ON THE DRUG TRAFFICKING ORGANIZATION (DTO)

12. In 2021, the Central Ohio Human Trafficking Task Force (COHTTF) initiated an investigation into Cordell **WASHINGTON** aka “Bro” aka “Dub” and Patrick **SAULTZ** aka “White Boy Pat”, who are alleged to be the leaders of a Drug Trafficking Organization (DTO) in Columbus, Ohio. Investigators believe this DTO is engaged in a large-scale conspiracy involving narcotics distribution, sex trafficking, fraud, and money laundering. The results of the investigation thus far have indicated that the DTO is bringing in large quantities of fentanyl and cocaine into Columbus, Ohio. These drugs were being sold in and around the Columbus area while simultaneously being used to coerce individuals to engage in sexual activity for profit, from which the DTO benefits. In beginning their investigation into the sex trafficking portion of this DTO, the COHTTF learned that **SAULTZ** was already under investigation with the DEA along with his co-target Cordell **WASHINGTON**.

13. Your affiant became involved with the investigation into this DTO when he received a call in September 2020 from the Columbus Division of Police (CPD) Narcotics detectives and patrol officers. During that call, CPD informed your affiant that that Patrick M. **SAULTZ** and Cordell A. **WASHINGTON** were members of a Drug Trafficking Organization (DTO) that had been distributing cocaine, heroin, fentanyl, and marijuana throughout the city of Columbus.

14. On May 17, 2022, a federal court order for the interception of wire and electronic communications for three separate telephone lines being utilized by Cordell **WASHINGTON** was obtained as it related to the investigation into this DTO and their illegal activities. On June 17, 2022, that federal court order was renewed for the continued wire and electronic interceptions of the telephone lines associated to **WASHINGTON**.

15. On June 9, 2022, a federal court order for the interception of wire and electronic communications for the telephone line being utilized by Patrick **SAULTZ** was obtained as it related to the investigation into this DTO and their illegal activities.

16. Based on the information obtained in the wire and electronic communications, in conjunction with the history of the investigation and the physical and electronic surveillance of this DTO, between June 29, 2022, and July 1, 2022, law enforcement executed ten search warrants on residences and storage facilities and four search warrants on vehicles related to the DTO led by **WASHINGTON** and **SAULTZ**. The searches of those locations led to the seizure of over \$1,000,000 in U.S. currency, copious amounts of suspected narcotics, and over 40 firearms.

17. On June 30, 2022, the Grand Jury returned an indictment for numerous **TARGET SUBJECTS** related to this DTO, to include **WASHINGTON** and **SAULTZ**, who were charged with federal offenses related to drug trafficking and conspiracy to commit the like.

18. On June 28, 2022, a search warrant was obtained for the residence of 150 Balderson Drive, Pickerington, Ohio. This address on Balderson Drive was known to investigators as the primary residence of Cordell **WASHINGTON**. On June 29, 2022, the search warrant was executed. The following items of interest were found during the search of the residence: (a) one handgun with ammunition, (b) \$10,795 in United States Currency, (c)

approximately 32.6 grams of suspected illegal drugs that were packaged for distribution and which came back testing positive for fentanyl and cocaine.

19. On June 30, 2022, a search warrant was obtained for the residence of 1214 Smith Road in Columbus, Ohio. This address on Smith Road was known to investigators as the residence of **PRISCILLA** Washington, Cordell **WASHINGTON**'s mother. In addition, throughout the course of the investigation into **WASHINGTON**, surveillance had observed **WASHINGTON** frequent this residence. More specifically, investigators had observed **WASHINGTON** frequent this location before suspected illegal drug transactions. On July 1, 2022, the search warrant was executed. The following items were found during the search of the residence:

- a. 32 firearms, including rifles, shotguns, and handguns. Six of these guns were reported stolen from several different jurisdictions in Ohio.
- b. High-capacity magazines, suppression devices and custom optics.
- c. Assorted caliber ammunition and shotgun shells.
- d. Approximately 553 grams of suspected illegal drugs that were packaged for distribution. The suspected drug types include fentanyl and crack cocaine.
- e. Bulk U.S currency that was hidden in crawl spaces within the residence.
- f. A money counter.

20. After the search warrant was executed and the contraband was recovered, an interview was conducted with **PRISCILLA**. During that interview, **PRISCILLA** stated other than she, along with three other individuals, have keys and access to her home. **PRISCILLA** named Cordell **WASHINGTON** as one of the individuals who has access to her home where the above noted contraband was seized.

SEARCH METHODOLOGY TO BE EMPLOYED AND STORAGE

21. The search procedure for extracting saliva and/or blood samples from the body may include the following techniques (the following is a non-exclusive list, as other search procedures may be used):

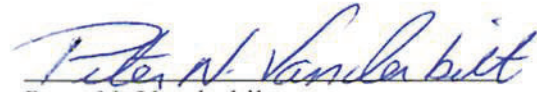
- a. the use of cotton or nylon tipped swabs to collect a saliva sample;
- b. the use of a medical professional to collect a blood sample;
- c. performing any other authorized technique that may be necessary to extract the evidence described in **Attachment B**;

22. The items contained in **Attachment B** as seized from the individual identified in **Attachment A** will be turned over to the Columbus Division of Police Property Control Facility or Laboratory, for analysis and any unconsumed swabs will subsequently be retained in the Columbus Division of Police Property Control Facility.

CONCLUSION

23. Based on the foregoing, there is probable cause to issue a search warrant for a Deoxyribonucleic Acid (DNA) sample from the person of Cordell A. **WASHINGTON**, more particularly described in **Attachments A and B**, as this DNA sample may constitute evidence of violations of 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug trafficking crime). Therefore, I request that the Court allow me and/or authorized law enforcement officers to take a cotton swab and place it inside the mouth of **WASHINGTON**, rubbing the inside of his cheek to obtain cellular material. This method allows officers to obtain saliva, and or topical or oral skin cells, by means of an oral swab. Based on my training and experience, I know this procedure is quick, painless, and involves minimal intrusions into the body. This warrant also permits authority to execute the search warrant with force if necessary.

Respectfully submitted,

A handwritten signature in blue ink that reads "Peter N. Vanderbilt".

Peter N. Vanderbilt
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to before me on this 29th day of August, 2022

A handwritten signature in black ink that reads "Elizabeth A. Preston Deavers".
Elizabeth A. Preston Deavers
United States Magistrate Judge

ATTACHMENT A
PERSONS/PLACES TO BE SEARCHED

The person to be searched is Cordell A. **WASHINGTON**, DOB: 10/17/1986, who is currently an inmate, #0140219, in the custody of the Franklin County Sheriff's Department, specifically Franklin County Correction Center II, located at 2640 Jackson Pike, Columbus, Ohio 43223.

ATTACHMENT B
ITEMS TO BE SEIZED

Deoxyribonucleic Acid (DNA) standard from the saliva of Cordell A. **WASHINGTON**, DOB: 10/17/1986, who is currently an inmate, #0140219, in the custody of the Franklin County Sheriff's Department, specifically Franklin County Correction Center II, 2640 Jackson Pike, Columbus, Ohio 43223, taken on sterile swabs.